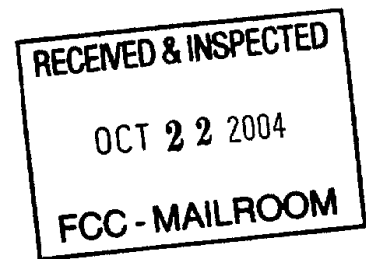


Dr. Sandra Woodruff
Engineering Consultant
2708 Hampton Ct. SE
Olympia, WA 98501

Phone: 360-705-0836
E-mail: SW@AToys.com



October 21, 2004

**Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743**

DOCKET FILE COPY ORIGINAL

**Re: Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
Oak Harbor, Washington
MB Docket No. 04-305; RM 10980**

Dear Madam Secretary:

Transmitted herewith on behalf of Dr. Sandra Woodruff is an original and four copies of her Reply to Comments in regard to the proposed allotment of Channel 289A to Oak Harbor, Washington pursuant to the Notice of Proposed Rule Making, DA 04-2461, released August 9, 2004 in the above-referenced proceeding.

Also included is an additional "Stamp and Return" copy. I ask that your office please affix your date stamp and return it in the enclosed envelope to help me verify that this document reached your office.

Respectfully submitted,

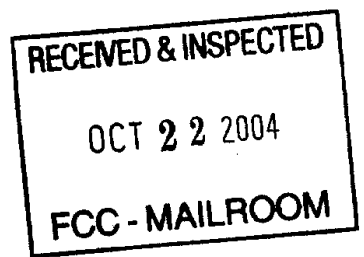
A handwritten signature in black ink, appearing to read "Sandra Woodruff".

Dr. Sandra Woodruff

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**Before The
Federal Communications Commission
Washington, D.C. 20554**



In the matter of:

Amendment of Section 73.202(b)

Table of Allotments
FM Broadcast Stations

Oak Harbor and Sedro-Woolley, Washington

MB Docket No. 04-305
RM-10980

To: John A. Karousos
Assistant Chief, Audio Division
Media Bureau

REPLY TO COMMENTS

I, Dr. Sandra Woodruff, Engineering Consultant, hereby reply to Comments regarding the Petition for Rulemaking, MB Docket No. 04-305, RM-10980, ("the Petition") that proposes to allot Channel 289A to Oak Harbor, Washington.

Reply comments from both Dana J Puopolo and Bible Broadcasting Network, Inc. each fail to address my original concern in precisely the same way. I stipulate that the proposed allotment does not appear to cause any interference with co-channel station CBU-FM, Vancouver, B.C. This has never been an issue.

The only issue is whether objectionable interference from CBU-FM would occur within the 60 dBu Protected Contour of the proposed allotment at Oak Harbor.

I quote from the page entitled "FM Station Separation Requirements to Canada 47 CFR Section 73.207", on the FCC website at the following address:
<http://www.fcc.gov/mb/audio/spacing/canada.html> ,

"A petition for rulemaking or application which is short-spaced to a Canadian station will be most likely to succeed where (1) no interference to reception of the Canadian station will occur over Canadian soil, and (2) no interference is received from the Canadian station within the protected service contour of the U.S. station."

As shown in my original Opposing Comments, well over 2/3 of the proposed 60 dBu contour lies within the 40 dBu Interfering Contour of CBU-FM. Should the proposal be granted, significant areas of objectionable interference would exist within the Protected Coverage area of the proposed Oak Harbor allotment.

Since neither BBN nor Mr. Puopolo have acknowledged the existence this Undesired Interference, I submit that they have not answered my objections.

Lacking a response to this fatal technical flaw from any opposing party, I hereby request that the Oak Harbor rulemaking be terminated.

I also ask that the Commission apply the same standard to the Counterproposal for an allocation of Channel 289A at Sedro-Woolley, WA since it is even more seriously affected by received interference than the Oak Harbor proposal.

Additionally, I also request that the Commission clarify its policy regarding border allocations where excessive interference would be received within the Protected Contour of the proposed station. Such a clarification would simplify the efforts of Consulting Engineers and other technical people seeking new allotments in areas near the common border with Canada.

Respectfully submitted,

Dr. Sandra Woodruff
Engineering Consultant
2708 Hampton Ct. SE
Olympia, WA 98501

AFFIRMATION AND CERTIFICATE OF SERVICE

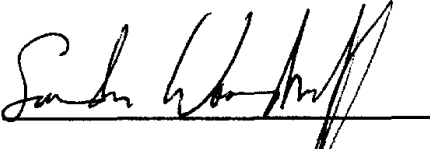
I, Dr. Sandra Woodruff, hereby certify that the information presented herein is true and accurate, to the best of my knowledge. I further certify that a copy of the foregoing Objection was served by pre-paid First Class United States Mail, postage prepaid, on this date, October 21, 2004, upon the following:

Dana J. Puopolo
2134 Oak Street, Unit C
Santa Monica, California 90405

Gary S. Smithwick
Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, NW
Suite 301
Washington, DC 20016

David Tillotson, Esq.
Counsel, Jodesha Broadcasting, Inc
In re: MB Docket No. 04-305
4606 Charleston Terrace NW
Washington, D.C. 20007

Ms. Rolanda F. Smith
Federal Communications Commission
Media Bureau
445 12th St. SW
Washington DC 20554


Dr. Sandra Woodruff